

Sealed

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

15-7

UNITED STATES OF AMERICA

vs.

CHARLES DEVAN FULTON, Sr., aka Black
And Black,
CHARMELL LATONYA POTTS,
DOMINIQUE WARNER, aka Meathead,
LAWERENCE JAMES JULIAN, aka Wolf
Defendants.

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CRIMINAL NO.

United States Courts
Southern District of Texas
FILED

MAY 20 2015

David J. Bradley, Clerk of Court

CRIMINAL INDICTMENT

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Conspiracy to Commit Sex Trafficking)

From on or about June 1, 2014 through April 1, 2015, in the Southern District of Texas and elsewhere,

**CHARLES DEVAN FULTON, SR. aka Black and Blacc,
CHARMELL LATONYA POTTS,
DOMINIQUE WARNER aka Meathead,
AND LAWRENCE JAMES JULIAN aka Wolf,**

conspired and agreed with each other, and others known and unknown to the Grand Jury, to knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain and maintain by any means, and benefit financially and by receiving anything of value, from participation in a venture which recruited, enticed, harbored, transported, provided, obtained, and maintained by any means, any person, knowing and in reckless disregard for the fact that means of force, fraud, and coercion would be used to cause these persons to engage in

commercial sex acts and that the persons had not attained the age of 18 years and that the persons would be caused to engage in commercial sex acts.

In violation of Title 18, United States Code, Sections 1594(c), 1591(a)(1) and (b)(1).

COUNT TWO
(Sex Trafficking)

From on or about June 1, 2014 through November 30, 2014, in the Southern District of Texas and elsewhere,

**CHARLES DEVAN FULTON, SR. aka Black and Blacc,
CHARMELL LATONYA POTTS,
DOMINIQUE WARNER aka Meathead,**

defendants herein, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, namely a minor female known as Minor Victim #1, who had attained the age of 14 but was under 18, knowing and in reckless disregard of the fact that Minor Victim #1 had not attained that age of 18 years and would be caused to engage in a commercial sex act, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means Minor Victim #1 knowing and in reckless disregard of the fact that Minor Victim #1 had not attained the age of 18 years and would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a), (b) and 2.

COUNT THREE
(Sex Trafficking of Minors)

On or about September 1, 2014 through December 31, 2014, in the Southern District of Texas and elsewhere,

CHARLES DEVAN FULTON, SR. aka Black and Blacc,

defendant herein, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, namely a minor female known as Minor Victim # 2, who had attained the age of 14 but was under 18, knowing and in reckless disregard of the fact that Minor Victim #2 had not attained that age of 18 years and would be caused to engage in a commercial sex act, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means Minor Victim#2 knowing and in reckless disregard of the fact that Minor Victim #2 had not attained the age of 18 years and would be caused to engage in a commercial sex act.

In violation of Title 18, United States Code, Section 1591(a), (b) and 2.

NOTICE OF FORFEITURE
18 U.S.C. § 2253(a)

Pursuant to Title 18, United States Code, Section 2253(a)(2) and (a)(3), the United States gives the defendant notice that in the event of conviction for the offenses charged in Counts One through Three of the Indictment, the United States will seek to forfeit all property, real and personal, constituting or traceable to gross profits or other proceeds obtained from the offenses charged in

Counts One through Three; and all property, real and personal, used or intended to be used to commit or to promote the commission of the offenses charged in Counts One through Three, or any property traceable to such property, including, but not limited to, the following:

Cellular telephones.

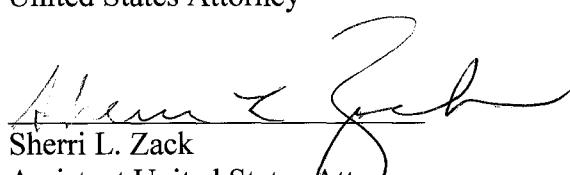
A True Bill:

Original Signature on File

Grand Jury Foreperson

KENNETH MAGIDSON
United States Attorney

By:


Sherri L. Zack
Assistant United States Attorney

713-567-9374
Julie Searle
Assistant United States Attorney